

1 Badma Gutchinov, Esq. # 140040
2 Law Office of Badma Gutchinov
3 P.O. Box 16431
4 San Francisco, CA 94116-0431
Telephone: (415) 572-7075
Facsimile: (855) 293-3696

5 Attorney for Debtor
6
7

8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
10

11 In re: JEFFREY E. DEWEESE,

Case No. 19-30625 HLB13
Chapter 13

12
13 Debtor,

**RESPONSE: RESPONSIVE SUPPLEMENTAL
DECLARATION OF DEBTOR IN
OPPOSITION TO RELIEF**

14
15 Date: February 20, 2020
16 Time: 1:00 p.m.
Dept: Courtroom 19

17 _____/
18 I, JEFFREY E. DEWEESE declare:

19 1. I am the Debtor. I have personal knowledge of the following facts and if I am
20 called to testify, I could and would competently testify hereto.

21 2. I am respectfully requesting that the automatic stay remain in effect while my
22 loan modification resubmitted application is under review or still under review as per servicer,
23 Fay communication with on January 31, 2020. As of filing of their motion, I had a pending loan
24 modification as of November 30, 2019 which was resubmitted on February 4, 2020. Attached
25 hereto is a true and correct of my only letter from Fay, marked hereto as Exhibit "B".

26 3. As per court's guideline re: residential loan modification on relief from stay
27 motion in Chapter 13 cases, Fay did NOT follow this guideline filing their motion prematurely
28

1 and mistakenly stated in their RS Cover Sheet that a loan modification was not submitted prior to
2 filing of their motion.

3 4. Fay Servicing further stated that I had until February 27, 2020 (see paragraph of
4 Fay's January 31, 2020 letter, Exhibit "B").
5

6 5. My attorney has Creditor's counsel to continue the hearing of this motion, but
7 they have not as filing my supplemental response. Now, I ask the motion to be withdrawn or
8 denied.

9 6. Since I have until February 27, 2020, I intend to provide Fay additional
10 supporting documents and am willing to amend my application so that I will be given fullest
11 consideration. I am asking the court to give me a chance while I have the stay in effect so that I
12 can work out a modification of the loan.
13

14 7. I declare under the penalty of perjury under the laws of the State of California
15 that the foregoing is true and correct. Executed in San Francisco, California.

16 Dated: February 14, 2020

/s/Jeffrey E. DeWeese

Debtor Jeffrey E. DeWeese
17
18
19
20
21
22
23
24
25
26
27
28